

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS)	
)	
Petition for a Certificate of Public Convenience and)	
Necessity, pursuant to Section 8-406.1 of the Illinois)	Docket No. 12-0598
Public Utilities Act, and an Order pursuant to Section 8-)	
503 of the Public Utilities Act, to Construct, Operate and)	
Maintain a New High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams, Brown,)	
Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton,)	
Macon, Montgomery, Morgan, Moultrie, Pike,)	
Sangamon, Schuyler, Scott and Shelby, Illinois.)	

**APPLICATION FOR REHEARING OF
AMEREN TRANSMISSION COMPANY OF ILLINOIS**

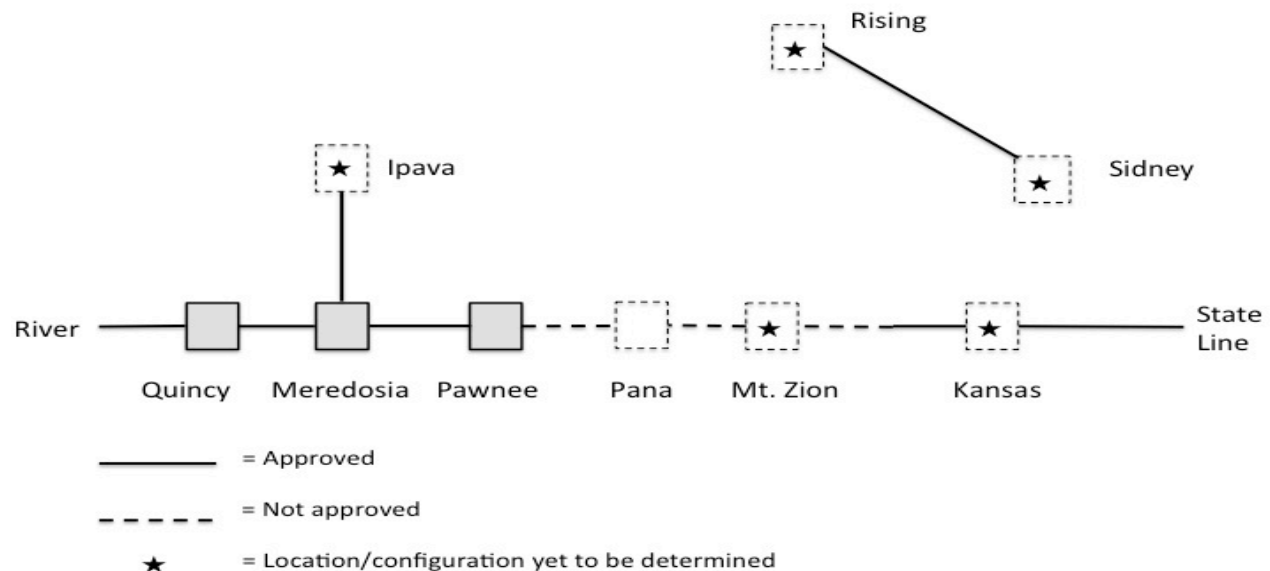
Pursuant to Section 10-113 of the Illinois Public Utilities Act, 220 ILCS 5/10-113 and Title 83, Section 200.880 of the Illinois Administrative Code, Ameren Transmission Company of Illinois, Inc. (ATXI or Company) submits this Application for Rehearing of the Commission's August 20, 2013 Order in this matter. The Order constitutes an "order on the merits" within the meaning of 83 Ill. Adm. Code 200.880(a), and this Application is filed within 30 days of service of the Order, as required by Section 200.880(a). As provided in Section 200.880(d), ATXI respectfully requests a ruling on this Application within 20 days.

I. INTRODUCTION

ATXI initiated this proceeding to seek a certificate of public convenience and necessity to construct and operate 9 segments of 345 kV transmission line, along with 9 substations. These lines and facilities collectively constitute the Illinois Rivers Project (Project). One of the main objectives of the Project is to link these lines and facilities to create a path through Central Illinois for the delivery of renewable energy to consumers in Illinois, as well as elsewhere in the Mid-continent Independent System Operator (MISO) region. The need for the Project is

documented through extensive study and analyses by MISO and its member-stakeholders.

The Commission's Order approves routes for 7 of the 9 transmission line segments and locations for 3 of 9 substations. The diagram below shows what was approved and what was not:



The Commission should grant rehearing to consider additional evidence concerning the routes for the two transmission line segments that were not approved. Rehearing will also enable the Commission to consider additional evidence concerning the location of the remaining 6 substations. Granting rehearing will allow the Commission and other stakeholders to timely consider these outstanding issues.

ATXI does not interpret the Order as a judgment by the Commission that only part of the Project is necessary. To the contrary, based on consideration of the entire record, “the Commission agrees that a 345 kV transmission line is necessary to address transmission and reliability needs in an efficient and equitable manner and will benefit the development of a competitive electricity market.” (Order 14.) The existing record “provides no grounds for the

Commission to generally find that the Illinois Rivers Project is not the best approach to meet the need at hand.” (*Id.*) Even though not every community along the Project route will benefit equally, “the electric grid that they are a part of will benefit from the improvements brought by the Illinois Rivers Project.” (*Id.*)

While not expressly stated in the Order, ATXI assumes the Commission understands and agrees that the full benefits of the Illinois Rivers *Project* cannot materialize unless the entire *Project* is built. (ATXI and MISO witnesses testified to this point, and no one challenged it.) In other words, building 75% of the Project will not necessarily produce 75% of the expected benefits. To achieve 100% of the benefits, 100% of the Project must be built.

The Commission, however, excluded from the certificate the Pawnee-Pana and Pana-Mt. Zion segments (and, by implication, the Pana substation) because of concern that connecting these segments at a new substation in Pana may not be the least-cost option, at least in comparison to a connection through a substation in Kincaid, Illinois. The Commission should grant rehearing to consider additional evidence pertaining to connections between Pawnee and Mt. Zion. Staff has suggested that connecting these segments through Kincaid “could” provide the same benefits as ATXI’s Pawnee-Pana-Mt. Zion proposal. Setting aside there was no record evidence to support this conclusion, rehearing will provide an opportunity for the Commission to consider additional evidence substantiating the operational and reliability benefits associated with a Pawnee-Pana-Mt. Zion route as compared to a Kincaid option.

With regard to the substation issues, no substation was approved for Pana because of the routing concerns discussed above. Thus, the need for the Pana substation will be addressed in the context of the Pawnee – Pana – Mt. Zion connection. The Commission agrees that a new substation is needed in the Mt. Zion area. The only outstanding issue is where it should be

located. ATXI will present evidence on rehearing of a proposed location. With regard to the remaining substations, ATXI will explain why it needs additional land rights to construct substation facilities, and any other related issues.

As required by 83 Ill. Adm. Code 200.880(b), the issues for which rehearing is sought are discussed with more specificity below.

II. ISSUES FOR WHICH REHEARING IS SOUGHT

A. Routing issues.

The Commission approved routes from the western border of Illinois to Pawnee, Illinois, and from the Macon County line west of Kansas, Illinois to the Indiana border. The Order thus creates an electrical “gap” in the Project between Pawnee and the Macon County line. ATXI will provide evidence addressing this issue. The Commission should grant rehearing to consider additional evidence regarding the means of eliminating this gap.

1. Pawnee-Pana (Order, Section VI.E.4.)

ATXI identified a primary and two alternate routes for a 345 kV line connecting Pawnee and Pana. (Order 78.) In briefing, the Company recommended its Alternate Route 2. (*Id.*) “Staff agrees that ATXI’s Alternate Route 2 would be the best choice if the Commission determines to include this segment in a certificate as part of this proceeding.” (*Id.*, at 82.) No other routes were proposed for this segment of the Project. (*Id.*, at 83.) The Commission did not expressly find that Alternate Route 2 is not the least-cost route for this segment. Instead, the Commission declined to approve any route due to the questions surrounding a possible connection through Kincaid. Rehearing would allow ATXI to present evidence and analysis of the Pana and Kincaid alternatives. This evidence plus evidence already in the record will enable the Commission to make an informed route determination for the areas in question.

2. Pana-Mt. Zion (Order, Section V.F.)

ATXI recommended approval of the route designated in its application as the Primary Route, and ultimately stipulated to by MCPO. (Stipulation Ex. 7.) Staff and Shelby County Land Owners also support this “Stipulated Route.” (Staff Ex. 1.0R, pp. 41-42; Shelby County Landowners’ Group Exs. 1.1 (Amended) – 3.4.) The Stipulated Route also resolves the concerns of Gan Properties, LLC. (ATXI Cross Ex. 3.) Mr. Corzine is the only party who opposed this route.

The Commission’s uncertainty about the need for a connection in Pana led it to decline approval for any route between Pana and Mt. Zion. As explained in the preceding section of this Application, ATXI’s rehearing evidence will include an analysis of the connections to Pawnee and Mt. Zion, which includes the Pana-Mt. Zion portion of the Project.

3. Mt. Zion-Kansas (Order, Section VI.F.7.)

ATXI and Moultrie County PO stipulated to the “MZK route” between Mt. Zion and Kansas. (Order 86) Several parties opposed this route, but upon consideration of all the evidence, the Commission determined “the MZK route to be the least cost route for the Mt. Zion to Kansas segment of the Illinois Rivers Project.” (Order 100.) The Commission went on to find, however, that the route would only be approved from the existing Kansas substation, westward to the Macon/Piatt County border. (*Id.*) “That portion of segment from the [Mt. Zion] substation to the [Macon/Piatt] county border should be determined at the same time the [Mt. Zion] substation location is determined.” (*Id.*) Thus, the final location of the Mt. Zion substation will substantially influence the route for the yet-to-be-approved portion of the Mt. Zion-Kansas route.

Section B.2. below addresses the additional evidence ATXI will present concerning the location of the Mt. Zion substation. ATXI’s rehearing evidence will include a proposed route from this location to the Macon/Piatt County border.

B. Substation issues.

ATXI's petition included a request for a certificate to build and operate 9 substations. For the most part, the need for the substations themselves and whether to connect to them was not questioned; what was questioned was whether existing substations provided adequate space for ATXI's substation equipment and facilities. The Commission should grant rehearing to consider additional evidence that will allow it to make a final determination with regard to the need for the Pana substation in light of the routing issue, and the location of the other 5 substations (i.e., Ipava, Mt. Zion, Kansas, Sidney and Rising).

The issue over whether to approve ATXI substations as ATXI proposed is whether the existing Ameren Illinois Company (AIC) substations provide adequate space to accommodate ATXI's substation equipment and facilities. The Order reflects frustration over the fact that whether the existing substations are adequately sized was not resolved in discovery. (See, e.g., Order at 129.) Rehearing will present the opportunity for ATXI to demonstrate more clearly why the AIC substation sites are not adequate and address other deficiencies. This evidence will include a map of each substation location, with drawings showing that necessary equipment and facilities simply will not fit within the confines of existing sites.

The issue with the Mt. Zion substation is slightly different. As stated in the Order, "Although the Commission agrees that a new substation in the Mt. Zion area is necessary, exactly where that substation should be located is less certain." (Order 86) Rehearing will allow ATXI and other interested parties to present evidence about where the Mt. Zion substation should be located, and why.

The Pana substation is not specifically addressed in the Order. As indicated above, the question of the need for the Pana substation would be addressed in the analysis of the Pawnee – Pana – Mt. Zion connection.

III. SCHEDULE

Section 10-113(a) of the Act sets a time frame for the Commission to “enter a final order upon rehearing within 150 days after such rehearing is granted.” 220 ILCS 5/10-113(a). To meet this deadline, ATXI offers the following schedule on rehearing for consideration:

ATXI Direct Testimony	October 24, 2013
Intervenor Routes Identified	November 1, 2013
Status Conference	November 15, 2013
Staff/Intervenor Direct Testimony	November 25, 2013
Staff/ Intervenor Rebuttal Testimony to Each Other	December 3, 2013
ATXI Rebuttal	December 11, 2013
Evidentiary Hearing	December 18-20, 2013
Initial Briefs	January 10, 2014
Reply Briefs	January 17, 2014
ALJ Proposed Order	February 7, 2014 (tentative)
Brief on Exceptions	February 21, 2014 (tentative)

IV. CONCLUSION

There is no dispute that the Illinois Rivers Project will bring important benefits to the MISO region generally, and Illinois in particular. The Commission should grant rehearing so that the uncertainty surrounding the unapproved portions of the Project is resolved and these benefits may begin to materialize.

Dated: September 18, 2013

Respectfully submitted,

Ameren Transmission Company of Illinois

/s/ Albert D. Sturtevant

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CERTIFICATE OF SERVICE

I, Albert Sturtevant, an attorney, certify that on September 18, 2013, I caused a copy of the foregoing *Application for Rehearing of Ameren Transmission Company of Illinois* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

/s/ Albert Sturtevant

Attorney for Ameren Transmission
Company of Illinois

VERIFICATION

I, Edward C. Fitzhenry, Director and Assistant General Counsel of Ameren Services Company, Illinois Regulatory Team, being first duly sworn, states that he has read the foregoing Application for Rehearing of Ameren Transmission Company of Illinois, that he is familiar with the statements made therein, and that the statements made therein are true and correct to the best of his knowledge.



Edward C. Fitzhenry

STATE OF ILLINOIS)
) SS
CITY OF SANGAMON)

SUBSCRIBED and SWORN to before me this 18th day of September, 2013.



Notary Public

